

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Woodstone Limited Partnership;  
Lofts at Farmers Market LLC,  
  
Plaintiffs,

Case No. 22-CV-1589 NEB-JFD

V.

City of Saint Paul, Minnesota, a Minnesota Charter City; City Council of the City of Saint Paul; Angie Wiese, in her official capacity as the Director of the Department of Safety and Inspections of the City of Saint Paul; Mayor Melvin Carter, in his official capacity as Mayor of the City of Saint Paul; and John Doe,

**SUPPLEMENTAL  
DECLARATION OF  
MEGAN D. HAFNER**

Defendants.

STATE OF MINNESOTA )  
 )  
COUNTY OF RAMSEY )      ss.

Megan Hafner, being first duly sworn on oath, states as follows:

1. I am an Assistant City Attorney, representing Defendants City of Saint Paul, Minnesota, a Minnesota Charter City; City Council of the City of Saint Paul; Angie Wiese, in her official capacity as the Director of the Department of Safety and Inspections of the City of Saint Paul; Mayor Melvin Carter, in his official capacity as Mayor of the City of Saint Paul, in the above-referenced matter.

2. I submit this Declaration in support of Defendants' Motion for Summary Judgment and in opposition to Plaintiffs' Motion for Partial Summary Judgment.

3. Attached as Exhibit 13 is a true and correct copy of the City of Saint Paul Ordinance No. Ord 22-37, Amending Chapter 193A of the Legislative Code pertaining to rent stabilization. A copy of this Ordinance was previously attached to my initial declaration [Doc. No. 53] as Exhibit 5, but that exhibit inadvertently did not contain a complete copy of the ordinance.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: December 12, 2022

*s/Megan D. Hafner*  
Megan D. Hafner